

Andrew P. Fishkin  
Zachary W. Silverman  
Fishkin Lucks LLP  
One Riverfront Plaza, Suite 410  
Newark, NJ 07102  
973.536.2800  
afishkin@fishkinluck.com  
zsilverman@fishkinluck.com  
Attorneys for Defendant  
American General Life Insurance Company

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

HELEN STRASSFELD, as Executrix of the  
Estate of Joseph Strassfeld, Deceased,

Plaintiff,

v.

AMERICAN GENERAL LIFE INSURANCE  
COMPANY,

Defendant.

Civil Action No.

**NOTICE OF REMOVAL**  
**(Diversity of Citizenship)**

**TO THE CHIEF JUDGE AND JUDGES OF THE UNITED STATES  
DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY:**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, defendant American General Life Insurance Company (“AGL”), hereby removes this action, which had been pending in the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-3097-17, to the United States District Court for the District of New Jersey. As grounds for removal, AGL states as follows:

1. The state court action was commenced by the filing of a Complaint on or about May 4, 2017. A copy of the Complaint is annexed as **Exhibit A**. Pursuant

to 28 U.S.C. § 1446(a), there has been no other process, pleading, or order served upon AGL.

2. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b) in that it is being filed within thirty days of the first date on which AGL received notice, through service or otherwise, of a copy of the initial pleading (the Complaint) setting forth the claims for relief upon which the action of plaintiff Helen Strassfeld, as Executrix of the Estate of Joseph Strassfeld, Deceased (“Strassfeld”), is based.

3. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be promptly filed with the clerk of the Superior Court of New Jersey, Law Division, Bergen County. A copy of the unfiled Notice of Filing is annexed as **Exhibit B**.

4. By filing this Notice of Removal, AGL does not waive any available defenses.

**THIS COURT HAS DIVERSITY JURISDICTION**

5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332, and therefore, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

6. Strassfeld alleges in the Complaint that she is a resident of the State of New Jersey and that she sues on behalf of a New Jersey estate. See Ex. A ¶ 1.

7. AGL is a corporation organized under the laws of the State of Texas, with its principal place of business in Texas.

8. Plaintiffs seek relief in excess of \$75,000, as their claim is for a \$1,000,000 death benefit allegedly due under an AGL life insurance policy. See Ex. A ¶ 7.

WHEREFORE, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, AGL respectfully requests that this action proceed in its entirety in this Court as an action properly removed thereto.

Dated: June 5, 2017

s/ Zachary W. Silverman  
Andrew P. Fishkin  
Zachary W. Silverman  
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afishkin@fishkinluck.com  
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CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

Pursuant to Local Civil Rule 11.2, Defendant American General Life Insurance Company, by its attorneys, hereby certifies that the matter in controversy is to its knowledge not the subject of any other action pending in any court, or of any pending arbitration or administrative proceedings.

Dated: Newark, New Jersey  
June 5, 2017

s/ Zachary W. Silverman  
Zachary W. Silverman